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September 19, 2023

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Thurgood Marshall United States Courthouse
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Petróleos de Venezuela, S.A. et al. v. MUFG Union Bank, N.A. et al., No. 1:19-cv-10023

Dear Judge Failla:

We represent the Trustee and the Collateral Agent as defendants in the action referenced above. We also represent the nonparty Directing Holders in connection with that action.

The Trustee and the Collateral Agent have moved before Your Honor for modification of the partial stay of the judgment in the action. *See* ECF No. 252. After submission of the reply brief on that motion, this firm became aware of an investor presentation that CITGO Petroleum Corp. issued recently and that in our judgment provides substantial support for factual positions taken by the Trustee and the Collateral Agent in connection with the motion. The investor presentation, however, is arguably subject to confidentiality restrictions. We have asked CITGO Petroleum to agree not to assert confidentiality-based objections to our submission of a copy of the investor presentation to Your Honor—under seal, if CITGO Petroleum so wishes—in connection with the motion. We will report to Your Honor as promptly as we can on the

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United States District Judge

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outcome of that request and, if it is refused, on any potential request by us for relief from the Court.

We are writing now to respectfully inform Your Honor of these events because, as the motion is fully briefed and could be decided on the papers at any time, we thought Your Honor might wish to know of the potentially imminent submission of an additional document in connection with the motion.

Respectfully submitted,



Walter Rieman

cc: Counsel of Record (Via ECF)